

1 Paul J. Cambria, Jr. (CA 177957)
2 pcambria@lglaw.com
3 LIPSITZ GREEN SCIME CAMBRIA LLP
4 42 Delaware Avenue, Suite 120
5 Buffalo, New York 14202
6 Telephone: (716) 849-1333
7 Facsimile: (716) 855-1580

8 Attorneys for Michael Lacey

9
10 IN THE UNITED STATES DISTRICT COURT
11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 **In the Matter of the Seizure of:**

13 Any and all funds held in Republic
14 Bank of Arizona Account(s) xxxx1889,
15 xxxx2592, xxxx1938, xxxx2912, and,
16 xxxx2500.

Case No. 2:18-cv-06742-RGK-PJW

**CLAIMANT MICHAEL LACEY'S
JOINDER IN JAMES LARKIN'S
OPPOSITION TO GOVERNMENT'S *EX*
PARTE APPLICATION TO EXTEND
DEADLINE AND HEARING**

Date: September 24, 2018

Time: 9:00 a.m.

Crtrm: 850

Assigned to Hon. R. Gary. Klausner

1 TO THE COURT AND ALL COUNSEL OF RECORD:

2 PLEASE TAKE NOTICE THAT Claimant Michael Lacey, by and through his
3 counsel, will and hereby does join in James Larkin's Opposition to the Government's *Ex*
4 *Parte* Application to Extend Deadline and Hearing (the "Opposition") [Doc. 41], and
5 adopts all of the positions set forth in the Opposition as if fully set forth herein.

6 Mr. Lacey joints in the Opposition because he is "so similarly situation [to Mr.
7 Larkin] that filing an independent [opposition] would be redundant." *Tatung Co., Ltd. V.*
8 *Shu Tze Hsu*, 217 F. Supp. 3d 1138, 1151 (C.D. Cal. 2016). Like Mr. Larkin, Mr. Lacey
9 holds an interest in assets that were seized pursuant to civil seizure warrants issued by the
10 magistrate judges in this District, and which are the subject of Mr. Larkin's Motion to
11 Vacate of Modify Seizure Warrants (the "Seizure Motion") [Doc. 6]. The Opposition
12 raises issues that are directly relevant to and overlap with the seizures of Mr. Lacey's
13 assets. All of the arguments made in the Opposition therefore apply with equal force to
14 the seizure warrants issued against the assets in which Mr. Lacey holds an interest.

15
16
17
18 DATED: September 12, 2018

Respectfully submitted,

19 Paul J. Cambria, Jr.

20 Lipsitz Green Scime Cambria LLP

21
22
23 By: /s/ Paul J. Cambria, Jr.

24 Paul J. Cambria, Jr.

25 Attorneys for Michael Lacey
26
27
28

CERTIFICATE OF SERVICE

I hereby certify that on September 12, 2018, I filed the foregoing with the United States District Court for the Central District of California using the CM/ECF system.

I hereby certify that on September 12, 2018, a copy of the foregoing was also delivered to the following via CM/ECF:

JOHN K. KUCERA, ESQ.
Assistant U.S. Attorney
U.S. Attorney's Office
Asset Forfeiture Section
312 North Spring Street
Los Angeles, CA 90012

Dated: Buffalo, New York
September 12, 2018

/s/April L. Kelly
April L. Kelly